

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

RUDOLPH W. GIULIANI
a/k/a RUDOLPH WILLIAM GIULIANI,

Debtor.

)
) Chapter 11
)
) Case No. 23-12055
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**CERTIFICATE OF NO OBJECTION
TO NOTICE OF PRESENTMENT OF PROPOSED ORDER ON
MOTION FOR ENTRY OF ORDER CLARIFYING WHETHER THE AUTOMATIC
STAY APPLIES TO STAY DISCOVERY IN CONSOLIDATED LITIGATION**

Pursuant to Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York, the undersigned counsel for Herring Networks, Inc. d/b/a One America News Network, Charles Herring, Robert Herring, Sr., and Chanel Rion (collectively, the “Herring Parties”) certifies as follows:

1. On January 12, 2024, the Herring Parties filed a *Motion for Entry of Order Clarifying Whether the Automatic Stay Applies to Stay Discovery in Consolidated Litigation* [Docket No. 49] (the “Motion”) via notice of presentment.

2. On January 18, 2024, US Dominion, Inc., Dominion Voting Systems, Inc. and Dominion Voting Systems Corporation (collectively, the “Dominion Parties”) filed their *Limited Opposition of the Dominion Parties to The Herring Parties’ Notice of Presentment of Proposed Order Setting Status Conference on Motion for Entry of Order Regarding the Automatic Stay and Underlying Motion Regarding the Automatic Stay* [Docket No. 58] (the “Objection”). No other objections or responses to the Motion were filed on the docket or received informally by counsel to the Herring Parties.

3. The Herring Parties and the Dominion Parties subsequently resolved the Motion and the Objection by filing the *Stipulation Concerning the Scope of the Automatic Stay of 11 U.S.C. § 362(a) with Respect to Certain Non-Bankruptcy Litigation Matters* [Docket No. 102] (the “Stipulation”), which was filed and served on February 7, 2024 and noticed via Notice of Presentment at Docket No. 103 (the “Notice of Presentment”), with objections due by 12:00 noon EST on February 12, 2024 (the “Objection Deadline”).

4. The undersigned reviewed the docket in this case 48 hours after the Objection Deadline passed. No objection, responsive pleading, or request for hearing regarding the Stipulation or the Notice of Presentment has been filed. The undersigned received an informal response to the Notice of Presentment from counsel to the Official Committee of Unsecured Creditors, which has been resolved by agreement reflected in the attached proposed order.

5. The undersigned requests that the Court enter the attached proposed order at the Court’s earliest convenience. A redline reflecting changes to the proposed order is also attached.

Dated: February 14, 2024

Respectfully submitted,

By: /s/ Victoria Argeroplos

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Counsel for the Herring Parties

Certificate of Service

I certify that on February 14, 2024, the foregoing was filed with the Clerk of the Court using the CM/ECF system, which will electronically mail notification of the filing to all counsel of record who are registered ECF users.

/s/ Victoria Argeroplos
Victoria Argeroplos